

Susan,

Thank you for providing the your April 15, 2014 memorandum summarizing your field observations from the April 11, 2014 and April 15, 2014 site visits to the Possum Point Power Station. We wanted to provide additional information relative to Ash Ponds A, B, C to ensure you have the most up to date information about the ponds.

First, based on a review of historical permit related documents there is a history of this area being addressed and in agency and Dominion documents. Two examples are provided below:

Stormwater requirements were first included in the permit for Possum Point in 1996. As a result, the storm water pollution prevention plan dated March 14, 1996 contains the following description of storm water Outfall S104.

VA# S104

**Outfall and
Drop Inlets
(pipes) and
[manholes]:**

(103)
VA# S104 <
(102)

**Outfall
Location:**

Latitude 38° 32' 34", Longitude 77° 16' 45"

Description:

Outfall VA# S104 is a 30" concrete pipe which is integral to an inactive decant structure that previously served Ash Ponds A, B, and C. The drainage area associated with VA# S104 is approximately 43.8 acres with 50% cleared, 10% highway, 25% medium woods, and 15% brush. Three drainage areas contribute runoff to this outfall:

1. A small drainage area (two acres) located on the northwest side of the intersection of Possum Point Road and Cockpit Point Road contributes runoff to VA# S104 via pipe #102. This area consists of 5% cleared, 30% highway, and 65% medium woods.
2. Approximately 16.9 acres just northwest of area 1 above, and bounded to the southwest by Possum Point Road, contributes runoff to VA# S104 via pipe #103. This area contains approximately 5% cleared, 5% highway, 35% brush, and 55% medium woods.
3. Approximately 25 acres (43.8 acres total minus 16.9 acres #103 and 2 acres #102) located west of drainage areas 1 and 2 above across Possum Point Road. It is within this drainage area that the old Ash Ponds A, B, and C were located.

Potential

Contaminants: None

The plan clearly identifies the location of the old ponds but concludes no potential for contaminants due to nature of drainage area that time.

The permit application submitted in 2006 provides the same description of the outfall and associated drainage area similar to the description above.

Another example is the VPDES permit reissued effective October 24, 2007. In Table 3 of the Fact Sheet developed by DEQ to support the permit contains a list of stormwater outfalls and drainage area descriptions that include S104.

Over time the coverage of this area has evolved in our SWPPP as the stormwater requirements and our understanding has evolved and we would be happy to discuss this further with you. In the current SWPPP this area is described as sheet flow to reflect the determination that as vegetation has grown over the area that the stormwater discharge is not associated with industrial activity.

In addition, some clarification is needed on the time frames various ponds were used. Based on the construction date for pond D, we believe that ash was placed in pond D around 1966. The original ash pond D is shown on USGS maps in 1966 and show ash pond D constructed. Based on this construction date, we believe that ash ponds A, B and C were no longer active. Ash pond D was later expanded in 1988.

Any thing to add on seeps
Acreage of the ponds, volume

We would be happy to discuss any of this information further with you. Please contact me at (804) 273-2929 with your questions.